

PRIVACY NOTICE

隐私声明

Effective Date: from 1 June 2023
生效日期: 自 2023 年 6 月 1 日起

VISTRA CHINA (COMPANY) LIMITED (好优投资咨询(上海)有限公司), VISTRA INTERNATIONAL EXPANSION CONSULTANCY SERVICES (BEIJING) LIMITED (睿迪思咨询服务(北京)有限公司), and VISTRA MANAGEMENT CONSULTING (FOSHAN) LIMITED (瑞致达(佛山)企业管理咨询有限公司) (COLLECTIVELY, “VISTRA CHINA”)

好优投资咨询(上海)有限公司、睿迪思咨询服务(北京)有限公司及瑞致达(佛山)企业管理咨询有限公司(统称“瑞致达中国”)

This Privacy Notice will help you understand the following:

本隐私政策将帮助您了解以下内容:

1. How to Contact Us - Queries, Complaints and Contact Details

如何联系我们——问询、投诉及联络方式

2. Your Rights to Your Personal Data

您的个人信息权利

3. How We Process, Handle and Collect Your Personal Data

我们如何处理、处置及收集您的个人信息

4. Outbound Transfer and Processing of Your Personal Data

跨境转移和处理您的个人信息

5. How We Use Cookies

如何使用 Cookies

6. How We Protect Your Personal Data

我们如何保护您的个人信息

7. Retention of your Personal Data

保留您的个人信息

8. Updates on the Privacy Notice

隐私政策更新

Introduction

介绍

This Privacy Notice explains the manner in which companies in the Vistra Group (meaning Vistra Group Holdings (BVI) III Limited, any of its current and future affiliated entities, or such other amalgamated or re-organised successor company(ies) of Vistra Group Holdings (BVI) III Limited, the “**Vistra Group**”) collect, use and disclose your personal data, and your rights in relation to the personal data which it holds.

本隐私声明解释瑞致达集团（即 Vistra Group Holdings (BVI) III Limited、其现时及未来的任何联属实体或 Vistra Group Holdings (BVI) III Limited 的有关其他合并或重组后的公司，统称“**瑞致达集团**”）旗下公司收集、使用和披露您的个人信息的方式，以及您对其所持有的个人信息的权利。

Vistra China (in this Privacy Notice, “**Vistra**”, “**us**”, “**we**” and “**our**”) is the processor of your personal data and, as a part of the Vistra Group, recognises its responsibilities in relation to the collection, holding, processing, use, disclosure and/or transfer of personal data under, amongst others, the People’s Republic of China (“**PRC**”) Cybersecurity Law (中华人民共和国网络安全法), the PRC Data Security Law (中华人民共和国数据安全法), the PRC Personal Information Protection Law (中华人民共和国个人信息保护法), the Decision on Strengthening Online Information Protection by the Standing Committee of the National People’s Congress (全国人大常委会关于加强网络信息保护的決定), and Information security technology - Personal information security specification by the the PRC Standardization Administration (中国国家标准化管理委员会——信息安全技术 个人信息安全规范), and any other applicable legislation, rules and guidelines on the protection of personal data (collectively, “**China DPL**”).

瑞致达中国（于本隐私声明称为“**瑞致达**”、“**我们**”和“**我们的**”）是您个人信息的处理者，作为瑞致达集团的一份子，瑞致达中国承认其根据（其中包括）《中华人民共和国（“**中国**”）网络安全法》、《中华人民共和国数据安全法》、《中华人民共和国个人信息保护法》、《全国人大常委会关于加强网络信息保护的決定》、《中国国家标准化管理委员会——信息安全技术 个人信息安全规范》及有关个人信息保护的任何其他适用立法、规则及指引（统称“**中国数据保护法**”）对收集、持有、处理、使用、披露及 / 或转移个人信息所需承担的责任。

Personal data will be collected by us only for lawful purposes to the extent necessary for the purposes for which it was collected, and we shall take reasonable steps to ensure that personal data held by us is accurate, up-to-date, and complete. We shall moreover implement all practicable and reasonable steps to protect any personal data we hold against misuse, interference, unauthorised or accidental access, modification, disclosure, processing, erasure, loss, or use.

我们将仅出于合法目的收集个人信息且仅限于收集该信息的目的所需的最小范围，我们将采取合理措施确保我们持有的个人信息属准确、最新和完整。此外，我们将实施所有可行且合理的步骤，以保护我们持有的任何个人信息免遭滥用、干扰、未经授权或意外访问、修改、披露、处理、删除、丢失或使用。

If we engage another party to process any personal data held by us, we shall adopt contractual or other means to ensure that such party complies with all applicable data protection laws and this Privacy Notice. We shall only use personal data for the purposes for which your personal data was originally collected and as further detailed herein. Such party that obtains/receives personal data from us shall be subject to its own separate and primary privacy obligations under PRC law.

如果我们聘请另一方处理我们持有的任何个人信息，我们将采用合同或其他方式确保该方遵守所有适用的数据保护法律和本隐私声明。我们只会将个人信息用于最初收集您的个人信息并在

此进一步详述的目的。从我们那里获取 / 接收个人信息的该方须遵守中国法律规定的其单独和主要的隐私义务。

We will use your personal data only in accordance with this Privacy Notice. Vistra may update this Privacy Notice from time to time. We advise you to periodically review this Privacy Notice to be informed of how Vistra is protecting your privacy. We will notify all eligible data breaches to the Cyberspace Administration of China (中华人民共和国国家互联网信息办公室) (“CAC”), as may be necessary and required, and all affected individuals.

我们将仅根据本隐私声明使用您的个人信息。瑞致达可能会不时更新本隐私声明。我们建议您定期查看本隐私声明，以了解瑞致达如何保护您的隐私。我们会将所有符合条件的数据泄露事件告知中华人民共和国国家互联网信息办公室（“网信办”）（如必要及按规定）和所有受影响的个人。

This Privacy Notice outlines Vistra’s practices and the choices you have concerning the collection and use of your personal data. This Privacy Notice should be read together with the applicable terms and conditions, terms of engagement, or service agreements of the relevant service or website provided by Vistra (the “**Terms and Conditions**”), provided that, in the event of any inconsistency between this Privacy Notice and the Terms and Conditions concerning matters relating to personal data, the Terms and Conditions shall prevail.

本隐私声明概述了瑞致达的做法以及您对收集和使用您的个人信息方面的选择。本隐私声明应与瑞致达提供的相关服务或网站的适用条款和条件、工作条款或服务协议（“**条款和条件**”）一起阅读，如果本隐私声明与有关个人信息事宜的条款和条件存在不一致，概以条款和条件为准。

This Privacy Notice supersedes any previous Privacy Notice or equivalent which you may have been provided with or seen prior to the Effective Date stated above.

本隐私声明取代您在上述生效日期之前可能已经获得或看到的任何先前的隐私声明或同等文件。

1. How to Contact Us – Queries, Complaints and Contact Details

如何联系我们——问询、投诉及联络方式

Requests for disclosure, access, correction, complaints, deletion, or other queries relating to how your personal data is processed should be addressed to us via the contact details set forth below:

有关您的个人信息的披露、访问、更正、投诉、删除或与如何处理您的个人信息有关的其他诉求，应通过以下联络方式发送给我们：

Address: 10/F, Tower 3, Lujiazui Finance Plaza, 826 Century Ave, Pudong New Area, Shanghai, China

地址：中国上海浦东新区世纪大道 826 号陆家嘴金融广场 T3 栋 10 楼

Telephone: +86 21 6085 6100

电话: +86 21 6085 6100

Email: Privacy@vistra.com

电邮: Privacy@vistra.com

To ensure the integrity and safety of personal data, Vistra will only disclose such data to you if our internal procedures are satisfied. Depending on the nature of your request, we may ask you to complete a personal data request form. To the extent permitted by applicable laws and regulations, we reserve the right to refuse unreasonable requests (for example, requests which infringe the privacy of others). To the extent permitted by applicable laws and regulations, we reserve the right to charge a reasonable fee for the cost of processing any request. All requests will be handled in a reasonable period of time.

为确保个人信息的完整性和安全性，瑞致达只会在符合我们的内部程序的情况下向您披露此类数据。根据您的请求的性质，我们可能会要求您填写个人信息请求表。在适用法律法规允许的范围内，我们保留拒绝不合理请求（例如侵犯他人隐私的请求）的权利。在适用法律法规允许的范围内，我们保留就处理任何请求收取合理费用的权利。所有请求都将在合理的时间内得到处理。

2. Your Rights to Your Personal Data

您的个人信息权利

Where applicable, under the China DPL or any other applicable data protection laws, you may have the right:

在适用的情况下，根据中国数据保护法或任何其他适用的数据保护法律，您可能有权：

- to be informed of the data processing rules applicable to you and to request to access such data;
知悉适用于您的数据处理规则及请求访问该数据；
- to request to access copies of your personal data;
请求访问您个人信息的副本；
- to require us not to send you marketing communications;
要求我们不向您发送营销讯息；
- to require us to erase, block or delete your personal data;
要求我们删除、阻断或清理您的个人信息；
- to require us to rectify or supplement the personal data we hold about you if it is inaccurate or incomplete;
如果我们持有的您的个人信息不准确或不完整，可以要求我们更正或补充；
- to request us to have your personal data transferred to a third party where technically feasible to do so; and
请求我们在技术上可行的情况下将您的个人信息转交给第三方；及
- to require us to explain our data processing rules and procedures.
要求我们对个人信息处理规则和流程进行解释说明。

Please note that the above rights, if applicable, are not always absolute, and we may be entitled to refuse requests where exceptions apply in accordance with applicable laws and regulations.

请注意，上述权利（如适用）并非一直是绝对的，在例外情况下，我们有权根据适用法律法规拒绝请求。

Requests for access, correction, complaints, or other queries relating to how your personal data is processed should be addressed to us via the contact details set out in Section 1. You may also contact the CAC directly (for more details, please revert to the following website: <https://www.cac.gov.cn>).

有关您的个人信息的访问、更正、投诉或与如何处理您的个人信息有关的其他诉求，应通过第1部分所载联络方式发送给我们。您也可以直接与网信办联系（详情请访问以下网站：<https://www.cac.gov.cn>）。

If you are located in the European Union (“EU”) and the EU General Data Protection Regulation applies:

如果您位于欧洲联盟（“**欧盟**”）并且适用欧盟《通用数据保护条例》：

- please refer to the EU regulator in the jurisdiction where you are located (in the EU) to find out more about your rights; and

请咨询您所在的司法权区（欧盟境内）的欧盟监管机构了解有关您权利的更多信息；及

- you can also make a complaint to a local EU regulator in the jurisdiction where you are located if you are not satisfied with how we are processing your personal data.

如果您对我们处理您个人信息的方式不满，您还可以向您所在司法权区的欧盟当地监管机构投诉。

3. How We Process, Handle and Collect Your Personal Data

我们如何处理、处置及收集您的数据

We may process, handle, and collect your personal data in a number of ways, for example:

我们可能以多种方式处理、处置及收集您的个人信息，例如：

- from the information you provide to us when you meet us;
- from information about you provided to us by your company or an intermediary, for instance through Know-You-Client (“KYC”) forms;

来自见面时您提供给我们信息；

来自您的公司或中介机构向我们提供的关于您的信息；

- when you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;

您与我们的电话、传真、电子邮件或其他形式的电子通信。就此而言，我们可能会监测、记录和储存任何此类通信；

- when you complete (or we complete on your behalf) client on-boarding or application or other forms;

您所完成（或我们代表您完成）的客户入职或申请或其他表格；

- from other companies in the Vistra Group;

来自瑞致达集团的其他公司；

- from your agents, advisers, intermediaries, and custodians of your assets; and

来自您的代理人、顾问、中介机构和您的资产保管人；及

- from publicly available sources or from third parties, most commonly where we need to conduct background checks about you.

来自公开来源或第三方，最常见的是我们需要对您进行背景调查。

3.1 The categories of personal data we may collect

我们可能收集的个人信息类别

We may collect the following categories of personal data about you:

我们可能会收集关于您的以下几类个人信息：

- your name and contact information, such as your home or business address, email address and telephone number;

您的姓名和联系资料，如您的家庭或公司地址、电子邮件地址和电话号码；

- biographical information which may confirm your identity including your date of birth, tax identification number and your passport number or national identity card details, country of domicile and/or your nationality;

可确认您身份的个人资料，包括您的出生日期、税务识别号码和您的护照号码或国民身份证详情、居住国及 / 或您的国籍。

- information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth, as well as your bank account details;

与您的财务状况有关的资料，如收入、支出、资产和负债、财富来源，以及您的银行账户明细；

- information about your knowledge and experience in the investment field;

您在投资领域的知识和经验情况；

- an understanding of your goals and objectives in procuring our services;

了解您采购我们服务的目标和目的；

- information about your employment, education, family or personal circumstances, and interests, where relevant, as may be necessary and required from time to time;

您的就业、教育、家庭或个人情况以及兴趣的相关信息（如必要及按不时的规定）；

- information to assess whether you may represent a politically exposed person or money laundering risk; and

可评估您是否可能代表政治公众人物或是否有洗钱风险的资料；及

- any other personal data you may decide to share with us or any member of the Vistra Group.

您可能决定与我们或瑞致达集团的任何成员公司共享的任何其他个人信息。

3.2 The purpose for processing your personal data, how we use that personal data and the parties with whom we may share it

处理您的个人信息的目的，我们如何使用该个人信息，以及我们与谁分享该数据

3.2.1 Performance of a contract

履行合同

We may process your personal data because it is necessary for the performance of our obligations under Terms and Conditions or any other contract, or in order to take steps at your request prior to entering into Terms and Conditions or any other contract.

我们可能会处理您的个人信息，因为这是履行我们在条款及条件或任何其他合同下的义务所必需的，或者是为了在签订条款及条件或任何其他合同前应您的要求采取措施。

In this respect, we may use your personal data for the following purposes:

就此而言，我们可能将您的个人信息用于以下方面：

- to prepare a proposal regarding the services we offer;
准备一份关于我们提供的服务的方案；
- to provide the services as set out in our Terms and Conditions or as otherwise agreed with you or our relevant contracting party from time to time;
提供我们与您或我们的相关订约方签订的条款及条件中规定的服务，或不时商定的其他服务；
- to deal with any complaints or feedback you may have; or
处理您可能有的任何投诉或反馈；或
- for any other purpose for which you provide us with your personal data.
用于任何其他您向我们提供个人信息的目的。

In this respect, we may share your personal data with, or transfer it to, the following parties:

就此而言，我们可能会与以下各方分享您的个人信息或将其转移到以下各方：

- your agents, advisers, intermediaries, and custodians of your assets who you tell us about;

您的代理人、顾问、中介机构以及您告知的资产保管人；

- third parties whom we engage to assist in delivering the services to you, including other companies in the Vistra Group;

我们聘请来协助向您提供服务的第三方，包括瑞致达集团的其他公司；

- our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, tax advisers, IT or public relations advisers;

我们的专业顾问，以获取建议或协助（如有必要），包括律师、会计师、税务顾问、信息技术或公共关系顾问；

- other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you; and

其他第三方，如我们向您推介的中介机构。我们会尽可能在推介前向您告知他们的信息；及

- our data storage providers and any other software providers that we require to perform our services.

我们的数据存储提供商及我们提供服务所需的任何其他软件提供商。

3.2.2 Legitimate interests

合法权益

We may also process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person, provided such is in compliance with the China DPL, as applicable. For instance, our legitimate interests may be as regards to suspected unlawful activity or misconduct of a serious nature, for the establishment, exercise, or defence of a legal claim or for the purposes of a confidential alternative dispute resolution process.

我们也可能出于我们的合法权益，或有时只要符合中国数据法的规定（如适用）而出于他人的合法权益处理您的个人信息。例如，我们的合法利益可能是关于涉嫌严重性质的非法活动或不当行为，为了确立、行使或辩护法律索赔，或者为了保密的替代争议解决程序的目的。

In this respect, we use your personal data for the following purposes:

就此而言，我们将您的个人信息用于以下方面：

- for marketing to you, provided in compliance with the China DPL, as applicable. In this respect, see the separate section on “Marketing” set out below;

用于根据中国数据法（如适用）向您营销。就此而言，详情见下文“营销”一节；

- training our staff or monitoring their performance;

培训我们的员工或监督他们的表现；

- for the administration and management of our business, including recovering money owed to us, and archiving or statistical analysis;

用于我们业务的行政及管理，包括追回我们的欠款，以及存档或统计分析；

- seeking advice on our rights and obligations, such as where we require our own legal advice; and
- defending a claim against us or prosecuting or making a claim against you or a third party.

用于针对我们的索赔进行辩护，或对您或第三方提起诉讼或提出索赔。

With respect to the purposes listed above, we may share your personal data with, or transfer it to, the following parties:

就上述目的而言，我们可能会与以下各方分享您的个人信息或将其转移到以下各方：

- your agents, advisers, intermediaries, and custodians of your assets who you tell us about;
- third parties whom we engage to assist in delivering the services to you, including other companies in the Vistra Group;

您的代理人、顾问、中介机构以及您告知的资产保管人；

- our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, tax advisers, IT or public relations advisers;

我们的专业顾问，以获取建议或协助（如有必要），包括律师、会计师、税务顾问、信息技术或公共关系顾问；

- our bankers, insurers and insurance brokers;

我们的银行家、保险公司及保险经纪人；

- other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;

其他第三方，如我们向您推介的中介机构。我们会尽可能在推介前向您告知他们的信息；

- our data storage providers and any other software providers that we require to perform our services; and

我们的数据存储提供商及我们提供服务所需的任何其他软件提供商；及

- third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.

第三方及其顾问，该等第三方正在收购或考虑收购我们的全部或部分业务。

3.2.3 Legal obligations

法律义务

We may also process your personal data for our compliance with a legal or regulatory obligation.

我们也可能为了遵守我们所承担的法律或监管义务而处理您的个人信息。

In this respect, we will use your personal data for the following:

就此而言，我们将您的个人信息用于以下方面：

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws; or
用于履行我们的合规和监管义务，例如遵守反洗钱法；或
- as required by tax authorities or any competent court or legal authority.
根据税务机关或任何主管法院或法律机构的要求。

With respect to the obligations above, we may share your personal data with the following parties:

关于上述义务，我们可能会与以下各方共享您的个人信息：

- our advisers where it is necessary for us to obtain their advice or assistance;
我们的顾问，以获取建议或协助（如有必要）；
- our auditors where it is necessary as part of their auditing functions;
我们的审计师，作为他们审计职能的一部分（如有必要）；
- third parties who assist us in conducting background checks;
协助我们进行背景调查的第三方；
- other companies in the Vistra Group;
瑞致达集团的其他公司；
- relevant regulators or law enforcement agencies where we are required to do so.
需要我们共享数据的相关监管机构或执法机构。

3.2.4 Marketing

营销

From time to time, we, or other members of the Vistra Group, may send you marketing communications about additional services we provide which may be relevant to you, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

我们或瑞致达集团的其他成员公司可能不时会向您发送有关我们提供的可能与您有关的额外服务的营销讯息，以及以提醒、通讯和邀请参加我们认为您可能感兴趣的事件或活动的形式提供的其他信息。

We, or other members of the Vistra Group, may communicate this to you in a number of ways including by post, telephone, email, SMS or other digital channels.

我们或瑞致达集团的其他成员公司可能以多种方式与您沟通，包括通过邮寄、电话、电子邮件、短信或其他数字渠道。

If you receive marketing communications from us but do not wish to receive them in the future, you may opt out of receiving them at any time, free of charge, by the following applicable means:

如您收到我们的营销讯息，但不希望以后再收到，您可以随时通过以下适用的方式免费选择不再接收这些讯息：

- unsubscribing by following the “Reply To” instructions contained in the marketing text message;
按照营销短信中载明的“回复至”指示取消订阅；
- following the unsubscribe instructions or hyperlink in the email;
按照电子邮件中的取消订阅指示或超链接；
- following the unsubscribe instructions in the applicable mobile application;
按照适用移动应用程序中的取消订阅指示；
- notifying us that you no longer wish to receive marketing communications when receiving our marketing calls; or
在接到我们的营销电话时通知我们，您希望不再接收营销讯息；或
- contacting us via the contact details set out in Section 1 stated above to tell us that you no longer wish to receive marketing communications through any channel.
通过第 1 部分中列出的联系方式与我们联系，告知我们您希望不再通过任何渠道接收营销讯息。

We may issue service-related announcements to you when necessary (e.g. new laws, regulations or compliance requirements). You may not be able to opt out of these announcements which are service-related and not promotional in nature.

我们可能会在必要时（如颁布新法律、法规或合规要求）向您发送与服务相关的公告。您可能无法选择不再接收这些与服务相关且非促销性质的公告。

3.3 Withdrawal of Consent

撤回同意

If you have given your consent and you wish to withdraw it at any time, please unsubscribe and opt out as outlined above or contact us via the contact details set out under Section 1.

如果您已同意并希望随时撤回，请取消订阅并选择如上所述退出，或通过第 1 部分所列出的联系方式与我们联系。

4. Outbound Transfer and Processing of Your Personal Data

跨境转移和处理您的个人信息

We may transfer, store, or process your personal data in locations outside the jurisdiction in which you are based (“**Jurisdiction**”). Where the countries to which your personal data is transferred do not offer an equivalent level of protection for personal data to the laws of the Jurisdiction, we will ensure that appropriate and reasonable safeguards and security measures are put in place. We will use appropriate and reasonable data security safeguards, use contractual confidentiality terms and agreements with third parties, ensure that the applicable country has equivalent data protection laws, seek your explicit consent to the transfer of your personal data to a place outside the Jurisdiction (each time as applicable), and/or implement security measures such as data de-identification before any outbound transfer of personal data.

我们可能会在您所在的司法管辖区（“**司法管辖区**”）以外的地方转移、储存或处理您的个人信息。如果您的个人信息被转移到的国家不能提供与司法管辖区法律同等水平的个人信息保护，我们将确保采取适当和合理的保护措施和安全措施。我们将使用适当和合理的数据安全保障措施，使用合同保密条款和与第三方达成的协议，确保适用的国家/地区拥有同等的法律保护，或寻求您明确同意将您的个人信息转移到司法管辖区以外的地方（每次均适用）和/或在个人信息跨境传输之前实施数据去标识化等安全举措。

4.1 Transfer and processing of your personal data outside the PRC

在中国境外转移和处理您的个人信息

Where we transfer your personal data from the PRC to an organization or individual (“**Overseas Recipient**”) outside the territory of the PRC, it will only be transferred on one of the following bases:

如我们将您的个人信息从中国转移至境外的组织或个人（“**境外接收方**”），其将仅基于以下任一情况进行转移：

- We have passed or will pass the security assessment organized by the CAC;
我们已经或将通过网信办的安全评估；
- We have obtained or will obtain personal protection certification from the relevant specialized institution; or
我们已经或将通过专业机构完成个人信息保护认证；
- We have concluded or will conclude a contract with the Overseas Recipient in accordance with the standard contract formulated by the CAC (“**SCC**”).

我们已经或将按照网信办制定的标准合同（“**标准合同**”）与境外接收方订立合同。

4.2 Description of the Outbound Transfer of Personal Data

个人信息出境说明

The Overseas Recipient and we have entered or agreed to enter into the SCC, and your request for a (redacted) copy of the SCC may be addressed to us via the contact details set out in Section 1, or to the Overseas Recipient via the contract information set out below. Please be informed that without explicit refusal within thirty (30) days, you would be a third-party beneficiary and be entitled to pursue us and/or the Overseas Recipient to exercise your rights under the SCC in accordance with applicable law.

境外接收方和我们已签订或同意签订标准合同。您可以通过第 1 部分所列出的联系方式向我们，或通过下方境外接收方联系方式向境外接收方要求提供合同（编辑后）的副本。请注意，如您

在三十（30）天内没有明确拒绝，您将根据标准合同约定成为第三方受益人，并有权根据合同条款向个人信息处理者和境外接收方的一方或者双方根据适用法律法规要求主张您在标准合同项下获得的权利。

Contact Person of the Overseas Recipient: Head of Legal, Asia Pacific

境外接收方联系人: 亚太地区法务总

Phone: +852 2521 3661

电话: +852 2521 3661

- Purpose(s) of processing - We may transfer and process your personal data outside the PRC for the purposes set out in Section 3.2;

处理目的 —— 我们可能出于第 3.2 条中列明的处理目的向中国境外传输和处理您的个人信息。

- Nature of processing – The Overseas Recipient and we may process your personal data through collection, storage, use, processing, transmission, provision, disclosure, deletion, and/or other methods necessary to fulfil the purposes mentioned above.

处理方式 —— 境外接收方和我们可能通过收集，存储，使用，处理，传输，提供，披露或删除等为实现上文列明的处理目的所必须的方式来处理您的个人信息。

- Nature of personal data – The personal data transferred or to be transferred outside the PRC may include basic personal data, personal identification data, personal education and employment data, personal property data, personal communication data and any other personal data or personal sensitive data which are specified in Section 3.1 above.

个人信息的种类 —— 已向或拟向境外传输个人信息可能包括个人基本资料，个人身份信息，个人教育工作信息，个人财产信息，个人通信信息等在第 3.1 条下列明的个人信息或个人敏感信息。

- Retention period after the outbound transfer – The Overseas Recipient may retain your personal data for no less than seven (7) years after the termination of our business relationship, unless otherwise instructed by you, required by applicable laws and regulations or for the purposes of court proceedings.

保存期限 —— 除非您另有指示,或适用法律法规另有规定,或为了法庭诉讼的需要我们会在我们的关系终止后保留您的个人信息至少七（7）年。

- The nature and procedures for you to exercise your rights – You may exercise your rights relating to how your personal data is processed through access, correction, deletion, changing the scope of your consent, obtaining the copies, complaints, or other queries to us via the contact details set out in Section 1, or to Overseas Recipient directly via the contact details set out above. You may also contact the CAC directly (for more details, please revert to the following website: <https://www.cac.gov.cn>) or take legal action, including filing of a suit in the court or application to an arbitral body for arbitration.

行使权利的方式和程序 —— 您可以通过第 1 部分所载联络方式向我们提出访问、更正、删除、改变授权同意、获取个人信息副本、投诉或其他方式来行使您处理个人信息相关的权利。你也可以直接通过上文境外接收方的联系方式向境外接收方提出上述请求。您

也可以直接与网信办联系（详情请访问以下网站：<https://www.cac.gov.cn>）或采取包括向法院提起诉讼或向仲裁机构申请仲裁的法律行动。

We carry out a data protection impact assessment every year on the outbound transfer activities of personal data to the Overseas Recipient. Your queries to obtain the relevant assessment report should be addressed to us via the contact details set out in Section 1.

我们每年对向境外接收方提供个人信息的活动开展个人信息保护影响评估，如您需要获取相关评估报告，请根据第 1 部分所列明的任何联系方式与我们联系。

4.3 Questions

问询

To find out more about transfers by us of your personal data and the countries concerned you can contact us via the contact details set out in Section 1 above.

如欲了解我们转移您的个人信息及所涉国家/地区的详情，请通过第 1 部分所载的任何联系方式与我们联系。

5. How We Use Cookies

我们如何使用 Cookies

Our website uses Cookies to improve your experience on our website. For full details on how Cookies are used, please see our Cookie Policy.

我们的网站使用 Cookies 来改善您在我们网站上的体验。关于如何使用 Cookies 的详情，请参见我们的 Cookie 政策。

6. How We Protect Your Personal Data

我们如何保护您的个人信息

We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. We have developed and implemented a comprehensive information security and business resilience framework aligned to industry best practices such as ISO/IEC 27001:2013 the International Standard for Information Security Management Systems (ISMS), IT Infrastructure Library (ITIL) for IT Service Management and ISO22301:2012 for Business Continuity Management Systems (BCMS).

我们使用各种安全技术和程序来帮助保护您的个人数据，防范未经授权的访问、使用或披露。我们开发并实施了符合业界最佳标准的全面的信息安全和业务连续性框架，包括 ISO/IEC 27001: 2013 认证的信息安全管理系统（ISMS）、IT 服务管理的 IT 基础设施库（ITIL）和 ISO22301: 2012 认证的业务连续性管理系统（BCMS）。

To learn more about our information security mechanism, and to view our certification, please visit <https://www.vistra.com/security>.

如果您需要了解有关我们信息安全机制的更多信息并查看我们的认证，请访问 <https://www.vistra.com/security>。

7. Retention of your data

保留您的数据

Should your account or relationship with us be cancelled or terminated or have otherwise expired at any time, we shall cease processing your personal data as soon as reasonably practicable following such cancellation or termination, provided that we may keep copies of your data as is reasonably required for archival purposes, for use in relation to any actual or potential dispute, for the purpose of compliance with applicable laws and regulations or for the purpose of enforcing any agreement we have with you, for protecting our rights, property or safety, or the rights, property or safety of our employees, and for performing or discharging any functions, obligations and responsibilities we may have. We may also continue processing your personal data for our legitimate interests, as further detailed in this Privacy Notice.

如您与我们的账户或关系在任何时候被取消或终止或以其他方式到期，我们将在合理可行的情况下尽快停止处理您的个人信息，前提是我们可以根据存档目的合理保留您的数据副本，用于任何实际或潜在的纠纷，以遵守适用的法律和法规，或用于执行我们与您达成的任何协议，以保护我们的权利、财产或安全，或我们员工的权利、财产或安全，以及用于履行或执行我们可能承担的任何职能、义务。我们也可能为了我们的合法利益继续处理您的个人信息，如本隐私声明中所详述。

7.1 Storage and third parties

存储和第三方

Vistra may store your personal data for processing in our local servers and Vistra Group databases, or use third party cloud vendors and data processors where we have contractual security measures and reassurances of appropriate security measures in place for as long as it is necessary or required in order to fulfill legal, contractual or statutory obligations or for the establishment, exercise or defense of legal claims, and in general where we have a legitimate interest for doing so (please also note the provisions under “Transfer and processing of your personal data cross-border” above in this regard). In particular:

如果我们有合同安全措施并保证适当的安全措施到位，瑞致达可能会将您的个人信息存储在我们的本地服务器和瑞致达集团数据库中进行处理，或使用第三方云供应商和数据处理器，只要是履行法律、合同或法定义务或建立、行使或抗辩法律索赔所必需或必要，而且我们如此处理通常有合法权益（请注意上文“跨境转移和处理您的个人信息”一节中的条款）。具体而言：

- where we have collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will retain that personal data for at least seven (7) years after the termination of our relationship, unless we are required to retain this information by another law, regulation or for the purposes of court proceedings; or
- 如果我们按照反洗钱立法的要求收集您的个人信息，包括用于识别、筛选和报告，我们会在我们的关系终止后保留有关个人信息至少七（7）年，除非其他法律法规要求我们保留有关资料，或为了法庭诉讼的需要；或
- otherwise, we will, in most cases, retain your personal data for a period of seven (7) years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.
- 否则，在大多数情况下，我们将在我们与您的合同或其他关系终止后保留您的个人信息七（7）年，以备因我们向您提供的服务而产生的任何索赔。

8. Updates on the Privacy Notice

隐私政策更新

We may occasionally update this Privacy Notice according to any changes in laws and regulations or updates on techniques. Without your express consent, we would not reduce your rights under this Privacy Policy. An older version of this Privacy Policy (January 2021) has been archived.

我们可能会因法律法规、技术更新变化而更新此隐私政策。但未经您明确同意，我们不会削减您按照本隐私政策所应享有的权利。我们已经将本政策的旧版本（2021年1月）存档备查。

[END]